



Hugo Neu Corporation

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September 27, 2012

Michael A. Mintzer, Esq.
Assistant Regional Counsel
New York/Caribbean Superfund Branch
Office of Regional Counsel
U.S. Environmental Protection Agency, Region II
290 Broadway, 17th Floor
New York, NY 10007-1866

Re: Response to EPA Request for Information
Newtown Creek Superfund Site, Queens, NY

Dear Mr. Mintzer:

I am enclosing the Response to EPA Request for Information of Hugo Neu Corporation. This response is being made by electronic mail today, with a copy to Caroline Kwan, and hard copies are being transmitted to each of you by Fedex today.

We appreciate your having granted extensions of time in which to file this response. Please let me know if you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "Andrew O. Feuerstein".

Andrew O. Feuerstein
General Counsel

Encl.

cc: Caroline Kwan,
Project Manager (w/ encl.)

RESPONSE TO EPA REQUEST FOR INFORMATION—HUGO NEU CORPORATION

General Response Applicable to All Responses:

Hugo Neu Corporation (HNC) never directly owned or operated the Facility. HNC's relationship to the Facility through joint ventures or other affiliates as set forth in Simsmetal East LLC's responses to the Request for Information is adopted as HNC's responses with respect to the time period prior to October 31, 2005. Since that time, HNC has not directly or indirectly through subsidiaries or affiliates had any involvement with the ownership or operation of the Facility and has no information responsive to the Request for Information relating to the time period after October 31, 2005. In connection with Simsmetal East LLC's responses generally to the Request for Information, HNC has cooperated in making employees and documents, including insurance files, available to Simsmetal East LLC and its attorneys. Simsmetal East LLC's responses and documents provided reflect in part the information and documents made available by HNC. HNC has reviewed the responses of Simsmetal East LLC and is generally satisfied that they accurately reflect information known or available to HNC for the period prior to October 31, 2005 and are incorporated by reference as HNC's responses except that HNC is not familiar with the Phase 1 report referred to in Simsmetal East LLC's response to Section 31 "as having been prepared at the direction of counsel for the purpose of rendering legal advice...." Accordingly, HNC does not adopt the response to that Section pertaining to said report.

Since Section 1.0 of the Request for Information calls for Company Information with respect to HNC, HNC provides its response to Section 1.0 below.

Section 1.0 Company Information

Response

1. a. The full legal, corporate name is Hugo Neu Corporation ("HNC"). The mailing address is 120 Fifth Avenue, Suite 600, New York, NY 10011.
- b.. HNC was incorporated in the State of New York on January 2, 1947. Its agent for service of process is Corporation Service Company, 80 State Street, Albany, NY 12207-2543. Since HNC is a New York corporation there is no need to qualify to do business in the State of New York.
- c. The Chief Executive Officer is John L. Neu
- d. On January 3, 1972, Hugo Neu Corporation changed its name to "Hugo Neu & Sons, Inc." On May 10, 1994, Hugo Neu & Sons, Inc. changed its name back to "Hugo Neu Corporation."
- e. N/A

2. Future EPA Communications should be sent to:

John L. Neu
Hugo Neu Corporation
120 Fifth Avenue, Suite 600
New York, NY 10011
(646) 467-6700
jneu@hugoneu.com
(Chief Executive Officer)

With a copy to:
Andrew Feuerstein
Hugo Neu Corporation
120 Fifth Avenue, Suite 600
New York, NY 10011
(646) 467-6700
afeuerstein@hugoneu.com
(General Counsel)

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION
NEWTOWN CREEK SUPERFUND SITE

State of New York:

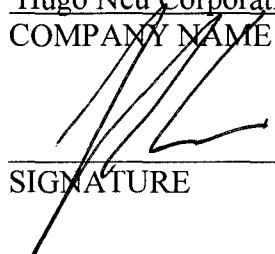
County of New York:

I certify under penalty of law that I have personally examined the information submitted in this document (response to EPA Request for Information), and that based on my inquiry of those individuals immediately responsible for obtaining the information and assisting in the preparation of this document and related exhibits and/or individuals who have assisted those individuals with such responsibility, I believe that the submitted information is true, accurate, and complete, and that all documents submitted as exhibits herewith are authentic copies. I am aware that there are significant penalties for submitting knowingly false information, including the possibility of fine and imprisonment. I am also aware that the EPA has asserted that the Company is under a continuing obligation to supplement its response to EPA's Request for Information if any additional information responsive to EPA's Request for Information should become known or available to the Company.


John L. Neu
NAME (print or type)

Chief Executive Officer
TITLE (print or type)

Hugo Neu Corporation
COMPANY NAME


SIGNATURE

Sworn to before me this 27th day of September, 2012


Notary Public

My commission expires: 6/2/16

[STAMP OR SEAL]